



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

SDD  
F. #2011R00783

*271 Cadman Plaza East  
Brooklyn, New York 11201*

June 25, 2015

By Hand and ECF

Honorable John Gleeson  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Agron Hasbajrami  
Criminal Docket No. 11-623 (S1)(JG)

Dear Judge Gleeson:

The government writes to apprise the Court of facts relevant to the current trial schedule in the above-referenced case. Over the last few weeks, the parties have been diligently engaged in both trial preparation and intense plea negotiations. The parties expect that this case will be resolved absent a trial, and have scheduled a 2:00pm appearance before the Court for Friday June 26, 2015, in the event that we have reached a final agreement. Due to complex issues in this case, however, including the fact that the case raises legal questions of first impression in this circuit, reaching final agreement as to the specific terms of the plea has been challenging and time consuming for both sides. Accordingly, a contingency plan, in the event that the plea is not entered tomorrow, may be appropriate in order to maintain the efficient procession to jury selection and trial, mindful of the Court's and the prospective jurors' expectations.

With respect to the current trial date of July 13, and the proposition that the jurors would be brought in at the beginning of next week to complete questionnaires, the parties jointly request that the Court consider granting a brief adjournment of the trial date of one week, until July 20, 2015.

The reasons for this request are several. First, the defendant previously has requested an adjournment of the trial date to accommodate his religious observances, which the government does not oppose. Second, while the parties have endeavored to engage simultaneously in trial preparation and plea negotiations, this endeavor has proven difficult. An adjournment of the trial date will allow the parties to either conclude plea negotiations or to more fully engage in trial preparation. Recently, the parties' attention has been necessarily

divided. Also, complex pretrial motions, such as the defendant's recent *Daubert* motion and discovery demand, remain pending and the government respectfully requests a sufficient amount of time to fully address these issues, assuming they are not rendered moot by a plea.

In addition, one of the undersigned Assistant U.S. Attorneys, Ms. Komatireddy, who has been central to this prosecution, has been on trial before the Honorable Joseph Bianco since May 4, 2015, and expects to remain on trial through next week and possibly the following week. Although initially expected to last approximately five weeks, due to unforeseen events in that trial, the trial has taken much longer than expected. While it is true that the government can, and has, proceeded in Ms. Komatireddy's absence, her knowledge of the case and anticipated role in the prosecution are important, and we would therefore seek the Court's accommodation to allow her to meaningfully participate in the trial preparation, jury selection and trial, should trial prove necessary. An adjournment of one week would be extremely helpful in this regard.

In sum, while the parties expect that this case will be resolved by plea on Friday June 26, 2015 at 2:00pm, in the event that the plea is not entered, the parties jointly request a brief adjournment of the trial date, of one week, for the reasons set forth above. I have spoken to counsel for the defendant, who join in this request. The parties respectfully request that the Court reserve judgment on this application pending the outcome of the proceedings on Friday afternoon, but write in advance of the proceeding to apprise the Court of facts relevant to that determination.

Respectfully submitted,

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cc: Defense Counsel of Record, via ECF and Email